

EXHIBIT A

Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this District, the Court hereby establishes the following consolidated schedule for discovery in these related cases. This Scheduling Order is entered to administer the trial of this case in a manner consistent with the Federal Rules of Civil Procedure's goal of securing "the just, speedy, and inexpensive determination of every action and proceeding." Fed. R. Civ. P. 1.

A. Plaintiff(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Plaintiff(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) or, where allowed, a report prepared by counsel has been disclosed to the other parties by **October 28, 2023**.

B. Defendant(s) shall file and serve a document identifying by full name, address,

and telephone number each person whom Defendant(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert pursuant to Fed. R. Civ. P. 26(a)(2)(B) or, where allowed, a report prepared by counsel has been disclosed to the other parties by **November 28, 2023**.

2. Records Custodians: Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than November 30, 2023. Objections to such affidavits must be made within 14 days after the service of the disclosures. *See* Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3) (D.S.C.).
3. Discovery: Discovery shall be completed no later than **November 30, 2023**. All discovery requests shall be served in time for the responses thereto to be served by this date. De Bene Esse depositions must be completed by the discovery deadline. **No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02 (D.S.C.) and have had a telephone conference with Judge Coggins in an attempt to resolve the matter informally. The request for a telephone conference should be made within the time limit prescribed by local rule for filing such a motion. Attorneys should send a request for a telephone conference via e-mail to: coggins_ecf@scd.uscourts.gov**

The parties shall set forth their respective positions in their request.

Within 15 days of the entry of this Order, each party shall designate at least one or more attorney representatives that will be present at any properly noticed deposition, allocating sufficient resources to avoid delays caused by scheduling conflicts. The parties shall consult and attempt to resolve any scheduling conflicts. In the event that deposition dates cannot be agreed upon after good-faith attempt, the party seeking the deposition shall request a telephone conference with the Court as described above.

4. Motions: All dispositive motions, *Daubert* motions, and all other motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial (other than *Daubert* motions), shall be filed on or before **December 30, 2023**.
5. Mediation: Mediation shall be completed in this case on or before **December 14, 2023**. *See* Judge Coggins' Standing Mediation Order (setting forth mediation requirements).

The parties' attention is specifically directed to Local Civil Rule 5.03 (D.S.C.) regarding the filing of confidential material. The parties' attention is also directed to the Court's website regarding instructions or other orders that may be applicable to your case.

United States District Judge

Dated: _____

Spartanburg, South Carolina

Pursuant to Local Civil Rule 83.I.06 (D.S.C.), this Order is being sent to local counsel only.